



## Proposed Regulation Agency Background Document

<b>Agency name</b>	Board for Asbestos, Lead and Home Inspectors
<b>Virginia Administrative Code (VAC) citation</b>	18 VAC 15-20
<b>Regulation title</b>	Asbestos Licensing Regulations
<b>Action title</b>	Amend
<b>Document preparation date</b>	March 15, 2005

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 21 (2002) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

### Brief summary

*In a short paragraph, please summarize all substantive changes that are being proposed in this regulatory action.*

In an effort to ensure the presence of a project monitor on asbestos projects, Subsection B of 18 VAC 15-20-456 has been modified to require a project monitor on the job site each day that asbestos abatement activities are being conducted. In addition, Subsection E has been added to 18 VAC 15-20-451 to make the asbestos contractor responsible for notifying the building owner that a project monitor is required on the asbestos project and to obtain written acknowledgment of such notification from the building owner.

Language has been added to Subsection A of 18 VAC 15-20-450 to empower the Board to deny license and approval as well as to take disciplinary action against those "acting as or being an ostensible licensee for undisclosed persons who do or will control or direct, directly or indirectly, the operations of the licensee's business."

Requirements for record keeping by accredited asbestos training providers and submission of records to the Board in Section 18 VAC 15-20-470 has been completely rewritten to outline specific procedures for accredited asbestos training providers when submitting course notifications and class rosters, as well as listing specific information that these notifications and rosters must contain.

The regulations have been reorganized to present the regulatory requirements in a format which is easier to understand. There are no substantive changes as a result of this reorganization. All DPOR boards are going through similar regulation reorganizations. This reorganization is an effort by the agency to make

the regulations more consistent with other DPOR board regulations, benefiting from the experiences of all of regulatory boards.

### Legal basis

*Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant law and/or regulation, including Code of Virginia citation and General Assembly chapter number(s), if applicable, and (2) promulgating entity, i.e., the agency, board, or person. Describe the legal authority and the extent to which the authority is mandatory or discretionary.*

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The Board for Asbestos, Lead and Home Inspectors is empowered to promulgate regulations under the legal authority found in Section 54.1-201 of the Code of Virginia, which empowers regulatory boards generally, and Section 54.1-501 of the Code of Virginia, which empowers the Board for Asbestos, Lead, and Home Inspectors specifically.

Section 54.1-501 uses the imperative form of the verb “shall,” thus making it mandatory that the Board promulgate regulations to administer and enforce the provisions of Chapter 5 of Title 54.1 of the Code of Virginia.

### Purpose

*Please explain the need for the new or amended regulation by (1) detailing the specific reasons why this regulatory action is essential to protect the health, safety, or welfare of citizens, and (2) discussing the goals of the proposal and the problems the proposal is intended to solve.*

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The intent of the proposed amendments to assure that project monitors are used on asbestos abatement projects. Project monitors are required on certain asbestos projects and must perform certain functions to assure that all asbestos fiber is removed before a project is completed. The amendments focus on assuring that property owners are aware of the requirement for the presence of a project monitor on asbestos projects and appropriate modifications to duties, responsibilities and functions of project monitors.

Also, the proposed amendments empower the Board to deny license and approval as well as to take disciplinary action against those acting as or being an ostensible licensee for undisclosed persons who do or will control or direct, directly or indirectly, the operations of the licensed or approved entity. The Board will be able to deny application to or take disciplinary action against individuals that have been disciplined and have found others to become licensed on their behalf.

Amending the requirements for record keeping by accredited training programs and requiring certain records to be submitted electronically will enable faster data processing and license issuance by the Board. The language allows manual reporting for those entities that lack the necessary software and hardware.

The intent of reorganizing the regulations is to present the regulatory requirements in a format which is easier to understand and to make them more consistent with other DPOR board regulations. This will further the efficient and economical performance of important government functions.

## Substance

*Please briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. (More detail about these changes is requested in the "Detail of changes" section.)*

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Licensed asbestos project monitors are required on all asbestos projects in buildings that are occupied or intended to be occupied upon completion of an asbestos project exceeding 260 linear feet or 35 cubic feet of asbestos-containing material or whenever the building or property owner deems it necessary to monitor asbestos projects. Asbestos is a naturally occurring fiber with insulation and fire retardant characteristics that has been used for many years in building construction. Inhaling the fibers may cause a very serious form of cancer that can result in disability and death. For this reason, the project monitor's role in assuring that all aspects of an asbestos abatement project are properly executed and that all asbestos fiber has been removed and safely disposed of before a project is considered to be complete is vital to the health of those working on the asbestos abatement project, those in the nearby vicinity and those that may occupy the premises in the future. The amendments will assure that building owners are aware of the requirement for project monitors on asbestos abatement projects and will modify the functions to be performed by project monitors to assure public protection from the hazards of asbestos fibers.

The Board has, from time to time, taken disciplinary action against certain firms and individuals or denied licensure or approval to those firms and individuals under its regulatory authority and its affirmative obligation to protect the public. The Board is concerned that those so disciplined or denied may find others who have not been so disciplined or denied to apply for and become licensed or approved. Those disciplined or denied will then operate as the ostensible licensee, or approved entity or individual, thus rendering the Board's regulatory authority ineffective. The Board's proposed amendments empower the Board to deny the application of or take disciplinary action against anyone found to be an ostensible owner acting on the behalf of a disqualified individual.

The keeping and submission to the Board of certain records by accredited training programs is the foundation of this program's protection to its regulants as well as to the public. Rapid and accurate reporting of information electronically will enable faster application processing. A provision is made for those entities that do not have the software and hardware to report electronically.

## Issues

*Please identify the issues associated with the proposed regulatory action, including:*

- 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;*
- 2) the primary advantages and disadvantages to the agency or the Commonwealth; and*
- 3) other pertinent matters of interest to the regulated community, government officials, and the public.*

*If the regulatory action poses no disadvantages to the public or the Commonwealth, please so indicate.*

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No disadvantages to the public or the Commonwealth have been identified.

Amendments that hold the Asbestos Contractor accountable for notifying the building owner that a licensed Project Monitor is required on asbestos project and amendments that require the Project Monitor to be present on the job site each day asbestos activities are being conducted will benefit the public by

ensuring that Project Monitors are present on asbestos project that require monitoring and to assure that all asbestos fiber is removed before a project is completed.

The public is further protected by empowering the Board to take disciplinary action against those acting as or being an ostensible licensee for undisclosed persons who do or will control or direct the operations of the licensed or approved entity.

The agency will benefit by requiring all training program notifications and rosters to be submitted in a uniform manner that will lead to streamlining the processing of applications and will ultimately get licenses to applicants sooner.

The agency's Compliance and Investigations Division will benefit from reorganizing the regulations by making the regulations more consistent with other DPOR board regulations. The public, government officials and the industry will benefit by reorganizing the regulations in a format which is easier to understand.

**Economic impact**

*Please identify the anticipated economic impact of the proposed regulation.*

<b>Projected cost to the state to implement and enforce the proposed regulation, including (a) fund source / fund detail, and (b) a delineation of one-time versus on-going expenditures</b>	(a) Fund source – NGF Fund detail – 0900  (b) No one-time or ongoing costs are associated with the proposed regulation amendments.
<b>Projected cost of the regulation on localities</b>	None anticipated.
<b>Description of the individuals, businesses or other entities likely to be affected by the regulation</b>	Asbestos Contractors and building owners will be affected by ensuring the presence of a Project Monitor on asbestos project.  Asbestos training providers will be impacted by requiring all training program notifications and rosters to conform to one manner of submission.
<b>Agency's best estimate of the number of such entities that will be affected</b>	There are 150 licensed asbestos contractors and 36 accredited asbestos training providers. There is no way of know how many building owners there are that may require project monitors on asbestos projects.
<b>Projected cost of the regulation for affected individuals, businesses, or other entities</b>	Since notifications and rosters will be required to be submitted electronically, training providers may incur the cost of computer electronic equipment which most firms doing business these days already possess.

**Alternatives**

*Please describe any viable alternatives to the proposal considered and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the action.*

In an effort to ensure the presence of a Project Monitor on asbestos projects, the Board explored the possibility of requiring the Project Monitor to be present on the asbestos job site the entire time that asbestos abatement activities are being conducted. This idea was rejected because the Board felt that it was not necessary for the Project Monitor to be present the entire time. The Board concluded that a Project Monitor could effectively monitor multiple job sites on the same day.

In consultation with the Department of Labor and Industry (DOLI), the Board concurred that it is the responsibility of the building or property owner to engage a Project Monitor on asbestos abatement projects. However, since neither DOLI nor the Board has statutory authority over the building or property owner, the Board's regulations could not require the building or property owner to secure a Project Monitor. However, since many building or property owners are not aware of the need for a Project Monitor, the Board decided to require the Asbestos Contractor to notify the responsible party of the project monitor requirements and to obtain written acknowledgement of this notification.

The Board is concerned that those individuals managing firms that have had their license or approval revoked or who are otherwise found unfit for licensure will induce others to obtain licensure or approval and allow the revoked individuals to operate the firm. The Board can find no authority in its existing regulations to address this concern and, therefore, is proposing this regulatory action.

**Public comment**

*Please summarize all comments received during public comment period following the publication of the NOIRA, and provide the agency response.*

Commenter	Comment	Agency response
Frank J. Dzapinka, Jr. Eastern Virginia Environmental 2425 Bowland Pkwy Ste 107 Virginia Beach, VA 23454 Phone -757.333.9120 Fax - 757.498.7896 Cell - 757.685.3058	<p>The following recommendations are offered as possible ways to help assure the presence of a licensed project monitor as required by 18 VAC 15-20-455.1.</p> <p>1. Regulations should be revised to require project monitoring firms be employed <u>only by the building owner or a general contractor, not by the asbestos abatement contractor</u>. The long-standing practice of project monitors working for the abatement contractor is not in the best interest of anyone other than the abatement contractor. Although not technically a conflict of interest, a faint scent of one can occasionally be detected. Working for the building owner (as suggested in AHERA, Appendix C to Subpart E, I.B.6) or for the GC gives the project monitor full authority to perform duties, functions, and responsibilities without the actual or perceived threat of disregard or dismissal that is possible when working for the asbestos contractor.</p> <p>2. Enactment can be implemented and</p>	<p>The Board's proposal will ensure the presence of a Project Monitor on asbestos projects each day that asbestos abatement activities are being conducted.</p> <p>It is a conflict of interest and a violation of the Board regulations for an asbestos contractor to have an employee/employer relationship with the project monitor. Additionally, the contractor shall not have any financial interests in the firm of which the project monitor is an employee.</p> <p>The Board has no statutory authority over the building owner. The Board's proposal ensures that the building owner is aware that a project monitor is required by making the asbestos contractor responsible for notifying the building owner that a project monitor is required on the asbestos project and obtaining written acknowledgment of such notification from the building owner.</p>

	<p>monitored through a two step process. One, a slight modification to the current notification form, and two, establishing a simple post-abatement form. Add new block 18 to the existing notification to include the statement "A project monitor is required on 1.) asbestos projects performed in buildings that are occupied or intended to be occupied upon completion of the asbestos project exceeding 260 linear or 160 square feet or 35 cubic feet of asbestos containing materials: or 2.) whenever the building or property owner deems it necessary to monitor asbestos projects." This project (check one) _____ does / _____ does not require a third party project monitor. The following company will be utilized to provide licensed project monitoring services:                  Company Name _____                  Company Reps Name _____                  I am aware that a licensed project monitor (check one) _____ will / _____ will not be required on this project. GC Rep Name &amp; Signature _____ OR Building Owner Name &amp; Signature _____</p> <p>In addition to the above, when the project is completed, the Project Monitoring firm will submit within 7 days a "Post-Abatement Monitoring Submittal Report" as evidence that the required monitoring has been conducted. This report would include building name and address, abatement contractor, dates the job was monitored, the name of the monitoring firm, and the name and signature of a company official. This report somewhat mirrors the reporting requirements for training providers.</p> <p>The modified notification would enhance the awareness of project monitoring requirements. A post-abatement report would "close the loop" and confirm that monitoring was conducted as required.</p>	
<p>Neil Talbert                  100 Morning Mist Drive                  Christiansburg, VA 24073                  (540) 577-2388</p>	<p>I am opposed to any amendments that would change the current requirements for the presence of a project monitor on asbestos projects</p> <p>First of all, an amendment to require a</p>	<p>The Board's proposal will ensure the presence of a Project Monitor on asbestos projects each day that asbestos abatement activities are being conducted.</p>

<p>(540) 381-3045 fax</p>	<p>project monitor on site for more than final clearance would more stringent than current EPA regulations and therefore prohibited under the Code of Virginia Sec. 54.1-501.6.</p> <p>The requirement for a project monitor to be on site should be for final clearance only or at the discretion of the owner. It is currently common practice throughout the Commonwealth for the owner to require a project monitor to be on site initially to approve containment, make one or more unannounced inspections and perform final clearance.</p> <p>On the majority of projects, the licensed designer specifies that the project monitor perform activities more stringent than the current regulations.</p> <p>It would be an unfair burden to ask property owners to pay additional monies to keep a project monitor on site throughout a project. If the thinking is that an amendment to require a project monitor full time would assure the work will be performed in compliance with regulations, I disagree. Any dishonest contractor or dishonest owner will circumvent this requirement simply by hiring a dishonest project monitor.</p> <p>Our industry has matured, the current regulations are well written and do not place an unfair burden on any regulant at this time.</p> <p>If the concern of the board is that some projects are being performed without project monitoring, what will the regulation requiring a project monitor for more than final clearance accomplish? If owners and contractors are not making sure final clearance is being performed now, why would they do anything any different if another regulation is promulgated requiring even more expense on their part?</p> <p>I seriously doubt any additional regulations at this time will benefit anyone. If the board is concerned to the point of action, I suggest consultation with DLI to explore the possibility of a requirement that the project monitor</p>	<p>It is a conflict of interest and a violation of the Board regulations for an asbestos contractor to have an employee/employer relationship with the project monitor. Additionally, the contractor shall not have any financial interests in the firm of which the project monitor is an employee.</p> <p>The Board has no statutory authority over the building owner. The Board's proposal ensures that the building owner is aware that a project monitor is required by making the asbestos contractor responsible for notifying the building owner that a project monitor is required on the asbestos project and obtaining written acknowledgment of such notification from the building owner.</p> <p>§ 54.1-501 (6) of the Code of Virginia referenced by Mr. Talbert prohibiting Virginia Regulations from being more stringent than EPA Regulations is referring to the Board's Lead-Based Paint Activities Regulations, not the Board's Asbestos Licensing Regulations.</p>
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	submit a "notice of completion" which could be added to the 20-day notice file.	
Kristin Famuliner REC, Inc. 540-463-3336	I've searched the DPOR website for a copy of the proposed changes to the current DPOR asbestos regs re: Project Monitors. Could you email the proposed changes or direct my attention to the correct prompt on your website?	Ms. Famuliner misunderstood the Notice of Intended Regulatory Action. The Board was soliciting comments on the current regulations, not proposing amendments.

**Family impact**

*Please assess the impact of the proposed regulatory action on the institution of the family and family stability.*

No impact on the institution of the family or family stability has been identified.

**Detail of changes**

*Please detail all changes that are being proposed and the consequences of the proposed changes. Detail all new provisions and/or all changes to existing sections.*

*If the proposed regulation is intended to replace an emergency regulation, please list separately (1) all changes between the pre-emergency regulation and the proposed regulation, and (2) only changes made since the publication of the emergency regulation.*

For changes to existing regulations, use this chart:

<b>Current section number</b>	<b>Proposed new section number, if applicable</b>	<b>Current requirement</b>	<b>Proposed change and rationale</b>
18 VAC 15-20-20	Same	Definitions	Definitions for "firm" and "licensee" have been added.
18 VAC 15-20-30 (A)	18 VAC 15-20-31	Shall use form provided by the department.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-30 (B)	18 VAC 15-20-32 (C)	18 years of age.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-30 (C)	18 VAC 15-20-32 (E.2, E.3.a, E.4.a, E.5.a, and E.6.a)	Completed appropriate training for Supervisor, Inspector, Management Planner, Project Designer, and Project Monitor.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-30 (D)	18 VAC 15-20-32 (E.1)	Completed appropriate training for Worker.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-30 (E,	18 VAC 15-20-31	Application required for	Reorganized to present

F, and G)		Contractor, Laboratory, and Training Program.	the regulations in an easier to understand format.
18 VAC 15-20-30 (H)	18 VAC 15-20-32 (I)	Good standing.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-30 (I)	18 VAC 15-20-32 (G)	Convictions.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-30 (J)	18 VAC 15-20-31 and 18 VAC 15-20-51	Application must be complete and fees nonrefundable.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-40	18 VAC 15-20-32 (F)	Experience and education verification forms.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-50 (A, C, E, and G)	18 VAC 15-20-52	Application fees.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-50 (A, B, C, D, E, F, H, and I)	18 VAC 15-20-53	Renewal and late fees.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-50 (J)	Repealed	Cannot renew after six months expired.	Redundant to 18 VAC 15-20-70 (H formerly G)
18 VAC 15-20-50 (K and L)	18 VAC 15-20-51	Checks made payable to Treasurer of VA and fees are nonrefundable.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-60 (A and B)	Same	Renewal required.	Section renamed, substance not changed.
18 VAC 15-20-60 (C)	Same	Training program renewal.	Outdated language deleted.
N/A	18 VAC 15-20-60 (D)	Renewal fee required.	Language added requiring fee as part of the renewal.
18 VAC 15-20-70 (A)	Same	Renewal procedure.	Section renamed, substance not changed.
18 VAC 15-20-70 (B)	Same	Renewal procedure.	Language regarding renewal procedures for training programs removed and placed in new subsection D.
18 VAC 15-20-70 (C)	Same	Renewal procedure.	Language added for clarification.
N/A	18 VAC 15-20-70 (D)	Renewal procedure for training programs.	Language regarding renewal procedures for training programs moved from 18 VAC 15-20-70 (B) and 18 VAC 15-20-459.11.
18 VAC 15-20-70 (D, E, and G)	18 VAC 15-20-70 (E, F, H)	Renewal procedure.	Subsections renumbered.
18 VAC 15-20-70 (F)	18 VAC 15-20-70 (G)	Renewal procedure.	Subsection renumbered and "renewal" was inserted before "fees as established" for clarity.
18 VAC 15-20-80	18 VAC 15-20-450 (A.11)	Change of address or name.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-90	18 VAC 15-20-32 (E.1)	Worker entry	Reorganized to present

		requirements.	the regulations in an easier to understand format.
18 VAC 15-20-101	18 VAC 15-20-32 (E.2)	Supervisor entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-110	18 VAC 15-20-33 (E.1)	Contractor entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-150	18 VAC 15-20-33 (I)	Denial of contractor license.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-250	18 VAC 15-20-32 (E.3.b)	Inspector entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-251	18 VAC 15-20-32 (E.3.c)	Inspector entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-270	18 VAC 15-20-32 (E.4.b)	Management Planner entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-271	18 VAC 15-20-32 (E.4.c)	Management Planner entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-290	18 VAC 15-20-32 (E.5.b)	Project Designer entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-291	18 VAC 15-20-32 (E.5.c)	Project Designer entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-330	18 VAC 15-20-32 (E.6.b)	Project Monitor entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-331	18 VAC 15-20-32 (E.6.c)	Project Monitor entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-332	18 VAC 15-20-32 (E.6.a)	Project Monitor training requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-361 (A)	18 VAC 15-20-31	Laboratory application required.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-361 (B, C, and D)	18 VAC 15-20-33 (E.2.a, E.2.b, and E.2.c)	Laboratory entry requirements.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-400	Same	Responsibility to the public.	To use more accurate terminology, all references to "regulant" have been changed to "licensee."
18 VAC 15-20-410	Same	Public statements.	To use more accurate terminology, all references to "regulant" have been changed to "licensee."
18 VAC 15-20-420	Same	Solicitation of work.	To use more accurate terminology, all references to "regulant" have been

			changed to "licensee."
18 VAC 15-20-430	Same	Professional responsibility.	To use more accurate terminology, all references to "approved entity" have been changed to "accredited asbestos training provider."
18 VAC 15-20-440	Same	Good standing in other jurisdictions.	To use more accurate terminology, all references to "regulants" have been appropriately changed to "licensee," "accredited asbestos training providers," "training managers," and "principal instructors."
18 VAC 15-20-450 (A)	Same	Sets grounds for disciplinary action.	Rephrased to add "to" before "suspend," "revoke," and "deny" to enhance language clarity.
18 VAC 15-20-450 (A.3)	Same	Prohibits altering or falsifying licenses and training certificates.	Rephrased for clarity
N/A	18 VAC 15-20-450 (A.12)	Silent	Added ostensible ownership language: "Acting as or being an ostensible licensee for undisclosed persons who do or will control or direct, directly or indirectly, the operations of the licensee's business."
N/A	18 VAC 15-20-451 (E)	Silent	Language has been added to make the asbestos contractor responsible for notifying the building owner that a project monitor is required on the asbestos project and to obtain written acknowledgment of such notification from the building owner.
18 VAC 15-20-453	Same	Conflict of interest.	Replaced "these regulations" with the more appropriate phrase "this chapter."
18 VAC 15-20-456	Same	Project monitor responsibilities.	Subsection B has been modified to require a project monitor's presence on the job site each day that asbestos abatement activities are being conducted.
18 VAC 15-20-459.6	18 VAC 15-20-34 (A, B,	Qualifications for	Reorganized to present

	and C)	training programs.	the regulations in an easier to understand format.
18 VAC 15-20-459.7	18 VAC 15-20-34 (D and E)	Approval procedures for training programs.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-459.8	18 VAC 15-20-34 (F)	Examinations for training programs.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-459.9	18 VAC 15-20-34 (G)	Approval letters for training programs.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-459.10	Repealed	Refresher training program approval.	Language in section is redundant to Part XIII, Accredited Asbestos Training Program Standards.
18 VAC 15-20-459.11	18 VAC 15-20-70 (D)	Renewal procedures for training programs.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-459.12	18 VAC 15-20-461	Changes to a training program.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-459.13	18 VAC 15-20-462	Transfer of approval of a training program.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-459.14	18 VAC 15-20-463	Access by the department to training provider.	Reorganized to present the regulations in an easier to understand format.
18 VAC 15-20-459.15	18 VAC 15-20-464	Disciplinary action against a training program.	Reorganized to present the regulations in an easier to understand format. The terms "suspension" and "revocation" have been replaced with "withdrawal" since this section speaks only to the Board's authority to withdraw approval of an asbestos training program, not suspension or revocation.
18 VAC 15-20-460	Repealed	General standards of practice and conduct for accredited asbestos training programs.	This section has been more appropriately incorporated into Section 18 VAC 15-20-463.
18 VAC 15-20-470	Same	Record keeping and provision of records to the board by asbestos training providers.	This section has been completely rewritten to outline specific procedures for asbestos training providers when submitting course notifications and class rosters, as well as listing specific information that these notifications and rosters must contain. Subsection J requires that

			all notifications and rosters be submitted in a uniform manner that will lead to streamlining the processing of applications.
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The amendments reorganize the regulations to make them more consistent with other DPOR board regulations and to benefit from the experiences of all of our regulatory boards. All DPOR boards are going through this sort of regulation reorganization. The reorganization presents the regulatory requirements in a different and easier to understand format.